Planning Justification Report

Official Plan and Zoning By-law Amendments (OPA/ZBA)

130 Guelph Avenue

City of Cambridge

December 18, 2024

Prepared for:
Landmark Homes

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INDEX

MAPS

APPENDICES

1.0 Introduction

1.1 Background

Dryden, Smith & Head Planning Consultants Ltd. has been retained by Landmark Homes to prepare a combined Official Plan and Zoning By-law Amendment application for 130 Guelph Avenue in Cambridge. This Planning Justification Report, along with the aforementioned applications, are being prepared to facilitate the proposed development of a 6-storey mixed-use building with 112 rental apartment units and 6 below grade commercial units. **100% of the proposed residential units are going to be classified as *affordable housing*.**

This report is to be read in conjunction with the formal submitted applications and additional required items outlined in the Pre-Consultation comments, all of which will be addressed in this report and included in the submission package.

1.2 Pre-Consultation

A Pre-consultation application was submitted for this development proposal, with Staff/Agency comments provided (December 2021). A copy of the Pre-consultation comments is attached at the conclusion of this report (Appendix A). Staff identified the need for the following reports/plans to be provided for the formal applications to be deemed complete:

- Accessibility Review
- Environmental Impact Study
- Floor Plans
- Functional Servicing Report
- Growth and Intensification Study
- Heritage Impact Assessment
- Landscaping Plan
- Lighting/Photometric Plan
- Massing Models and Elevations
- Noise Study
- Planning Justification Report
- Record of Site Condition and Ministry Acknowledgment Letter
- Risk Management Plan
- Sanitary Servicing Capacity Assessment
- Site Concept Plan
- Shadow and Wind Study
- Source Water Compliance Section 59
- Stormwater Management Report
- Transportation Impact Study
- Tree Management Plan/Vegetation Plan (if tree removal is proposed)
- Truck Turning Drawing
- Prelim. Grading/Servicing Plans
- Urban Design Brief
- Parking Study

1.3 Proposed Applications

A combined Official Plan and Zoning Amendment application has been submitted to permit for the proposed intensification and redevelopment of the Site. Site Plan

Approval will also be required following the approval of the aforementioned Official Plan and Zoning By-law Amendment applications.

The Site is designated as Built-Up Area in the City of Cambridge Official Plan ("OP") as indicated on Map 4. The General Land Use Plan designates these lands as Business Industrial. The subject lands are also located within a Regeneration Area in the Cambridge Official Plan (see Map 6). The requested Site-Specific Official Plan Amendment ("OPA") is to change the land use designation of the site from Business Industrial to mixed-use Residential and Commercial and allow for an increase in density. The requested Zoning By-law Amendment is to change the zoning designation of the Site from M3 Industrial to C1RM1, mixed use commercial/residential. The zone change is required due to the existing M3 zoning designation which does not allow for the proposed mixed-use residential / commercial development.

Along with the zoning by-law amendment, we will be seeking site-specific Zoning provisions to allow for minor deficiencies in parking, landscape, and amenity areas.

Further details on the requested Official Plan and Zoning By-law Amendments can be found in Sections 6.3 and 6.4 of this report.

1.4 Scope

This Planning Justification Report will include the following:

- A description of the Site and surrounding neighbourhood context;
- An overview explaining the development proposal, as well as the formal applications required to permit the proposed intensification;
- A summary of the prepared Technical Reports/Plans;
- A review of the relevant Provincial and Municipal planning policies/regulations that affect the proposed development/applications;
- An assessment of the proposal with respect to the relevant Provincial and Municipal policies; concluding with a final planning justification and opinion on the requested ZBA/OPA for 130 Guelph Ave. in Cambridge.

2.0 Site Description & Surrounding Context

2.1 Site Description

The Site is located at and fronts onto 130 Guelph Ave in the City of Cambridge (see Map 1 attached). These lands are legally described as 'Plan 803, Lot 15, and Part of Lots 14 & 20'. As per the completed Site Plan Concept (Appendix B), the Site is listed as having a *lot area* of 7770m^2, *lot frontage* of 50.64m, and *lot depth* of 128.93m and a small portion of City-owned lands, which will be purchased from the City. These lands front onto Sheffield Street with a width of 6.2m and depth of 92.2m with a total area of 8,080m^2. These City-owned lands form part of an access easement with the neighbouring property and will be purchased from the City. Conversations have been had with staff and they concluded that these lands are surplus and discussions are in the works for Landmark Homes to obtain these

lands. Access to the adjacent properties will be improved through site upgrades and reconstruction. The subject lands are located within an existing built-up neighbourhood which defines the start of the industrial area and an established residential neighbourhood.

The subject lands are fairly flat with the property gently sloping to the south. The Site recently contained several old industrial buildings. Portions of the buildings have been demolished and the remaining buildings will be removed before construction begins on the Site.

2.2 Surrounding Land Uses

The Site is located just outside the Hespeler Community Core area but it is located in the designated Regeneration Area. The subject lands border an existing residential neighbourhood to the north, the CN Rail to the south, and mixed-use commercial and industrial to the east and west. The built form to the west and south consists primarily of low-level industrial/ commercial buildings.

Multiple bus stops are located within a short walk of the Site, with the closest stops being located at the intersection of Guelph Ave. and Sheffield Street. The Site is located at the corner of Guelph Avenue and Sheffield Street. Guelph Ave. is designated as a collector road and is directly on the Planned Transit Network, while Sheffield Street is classified as a city street.

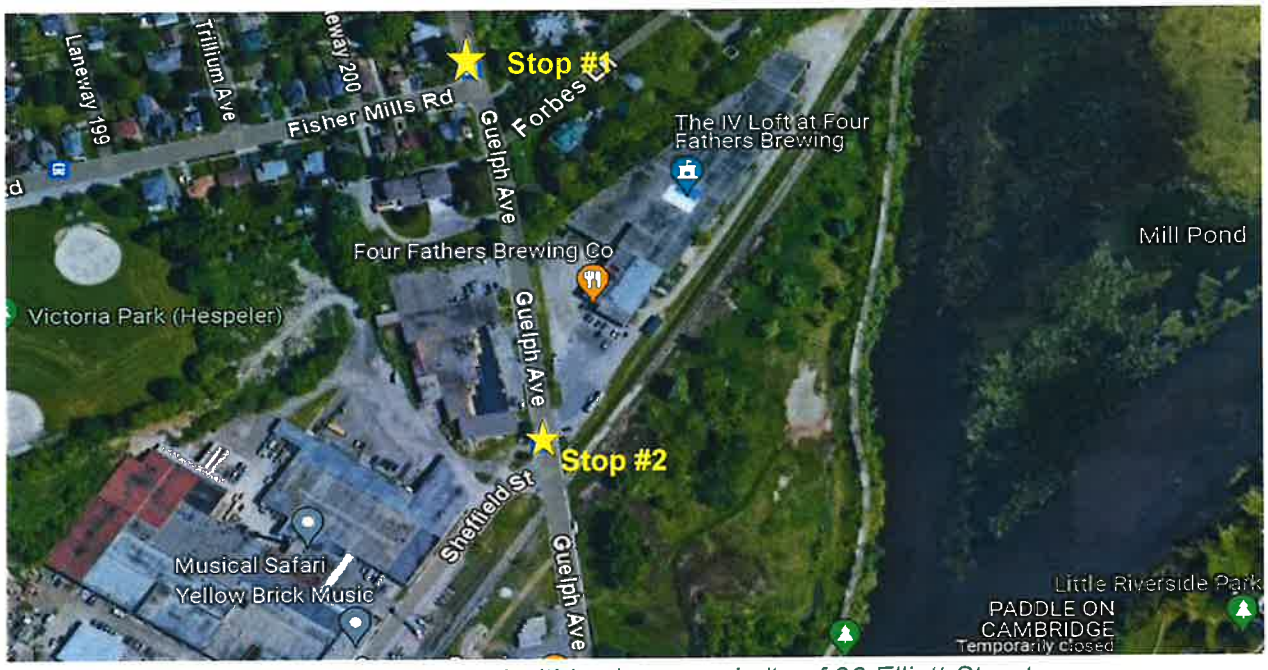


Figure 1: Bus Stops located within close proximity of 36 Elliott Street

2.3 Municipal Services

2.3.1 Water Supply, and Storm Sewer/Sanitary Servicing

The existing municipal water supply/distribution system consists of 300mm watermain located on Guelph Ave. There is also an existing fire hydrant located in close proximity to the Site across the intersection of Sheffield and Guelph Ave. Municipal water supply is available on Guelph Ave and Sheffield Street. (See Appendix C, *Section 2.4.1*).

As noted in the *Functional Servicing Report (*Appendix C, Section 3), the proposed development will be serviced with a proposed 150mm water service that will feed off of the existing watermain on Guelph Ave.

Municipal storm sewers exist on Sheffield and Guelph Ave. It is anticipated that the existing connections will be used to service the proposed building.

The proposed building will be serviced by a new 200mm sanitary sewer. Drainage from this proposed sanitary sewer will discharge to the existing 375mm sanitary sewer on Guelph Ave., which will then ultimately be discharged into the existing 750mm sanitary sewer (See Appendix C, *Section 4.0*).

2.3.2 Hydro and Gas

Local hydro is provided to the Site, and gas is also available for hookup.

2.3.3 Telephone and Cable Service

Telephone and cable service is available to the subject property.

3.0 Proposed Development and Applications

3.1 Proposed Development

The proposed development can be seen in the attached Site Plan, Elevations, and Floor Plans (Appendix B, D). These plans/drawings are preliminary at this time and will be further refined during Site Plan Approval. Refer to the Urban Design Report completed by Two Row Architect (Appendix E) for additional details on the site layout and building design choices for the development.

3.2 Site Layout

As demonstrated in the proposed Site Plan and Building Designs, the building layout takes on an I-shaped configuration, effectively establishing street-facing walls along Guelph Ave. This architectural choice serves a functional purpose and is aesthetically pleasing (See Appendix B).

The I-shaped structure connects the building along both streets, emphasizing a human-scaled design. Along Guelph Ave., 2 walkways and a driveway will

provide pedestrian and vehicular access to the subject lands providing connectivity and fostering a sense of community.

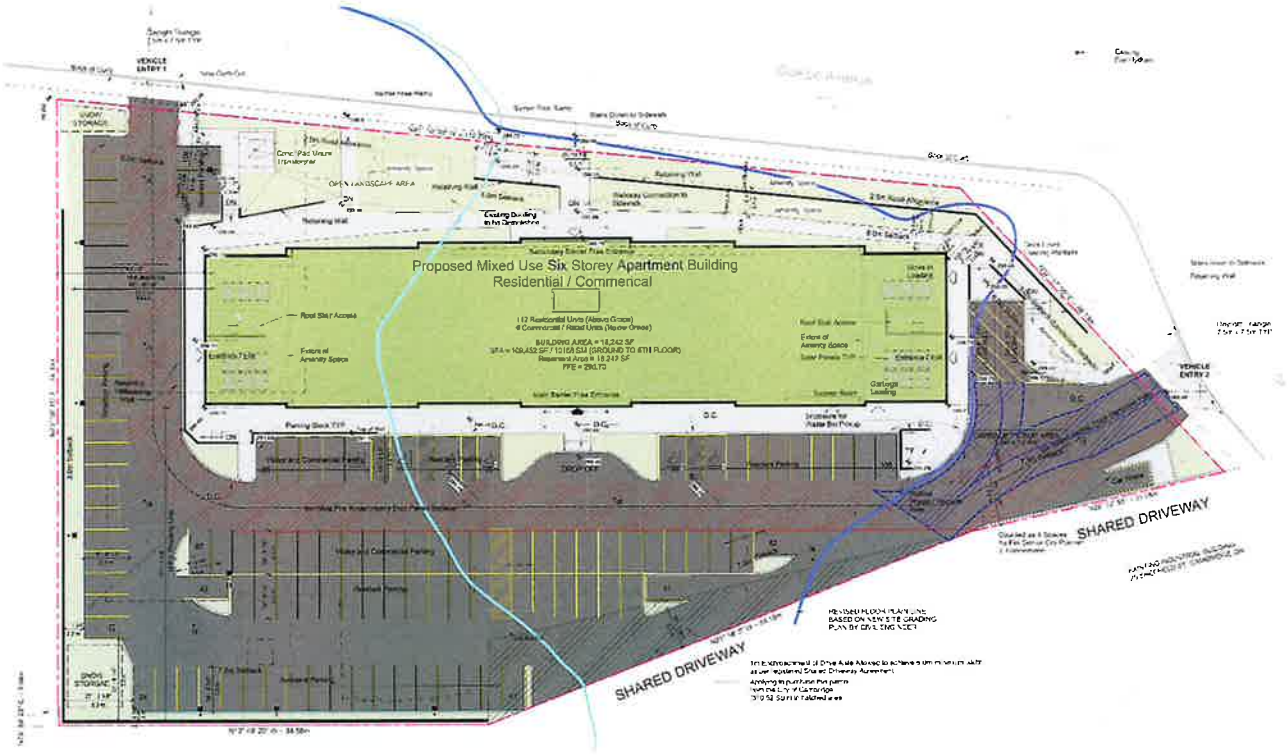


Figure 2: Proposed Site Plan

To facilitate vehicular access to the Site, two access driveways have been incorporated which also serve as the designated Fire Route for the proposed development. The main entrance and driveway will be located off of Guelph Ave. and will offer multi-directional access, ensuring a safe and efficient flow of vehicles in and out of the property (see Figure 2 and Appendix D).

The addition of a roof top amenity area, as well as community rooms, will help to shape and maintain the sense of community within the building.

3.3 Height, Massing & Built Form

The development proposal is for a 6-storey mixed-use development which will consist of 112 affordable residential units and 6 below grade commercial units with an approximate height total of 23.3 +/- meters.

As noted in the City of Cambridge Official Plan the Site is located within Built-Up Area and is in the Regeneration Area (see Map 6).

The City of Cambridge's Built-Up Area is slated to contribute to the Region's re-urbanization targets and will consist of 45% of the residential development. As stated in the Official Plan, intensification will be encouraged in these areas.

The proposed height and massing of this development are suitable for the Site and in line with the Official Plan and Zoning By-law. The Site is situated on the Planned Transit Network aligning with the height and density targets and the goals and policies outlined in the Cambridge official Plan. For more information about the Site's design, please refer to the attached Urban Design Report in Appendix E.

3.4 Unit Mix and Composition

The proposed 112 residential units will be located on the top 6 floors providing 1-, 2-, and 3-bedroom units tailored for affordable housing. The first floor (ground floor) will house 12 units; floors two to six will have 20 units each.

The ground floor, or basement, will have a mix of 6 commercial rental units, office space, amenity rooms for the tenants, and a storage area.

The unit mix of the 112 residential units is expected to be 21 1-bedroom units, 81 2-bedroom units and 10 3-bedroom units.

See the attached Site Plan Design Package and Urban Design Report for additional information (Appendices D and E).

Unit Type	Unit Count
1 Bedroom	21
2 Bedroom	81
3 Bedroom	10

3.5 Parking

As noted in Section 2.1 of this report, there are currently two existing vehicular access points on the Site, one from Guelph Ave. and the other from Sheffield Street. These existing access points will remain in their current positions, providing access to the proposed building and the associated parking area. The primary access point will be situated on Guelph Ave. (refer to Figure 2).

All of the planned parking spaces for the development will be at ground level, and the parking area will be positioned behind the building, as required by the Zoning By-law and Design Guidelines.

Specific details and justifications regarding parking can be found in the completed Transportation Impact Study (see Appendix F), and a summary of this information is provided below.

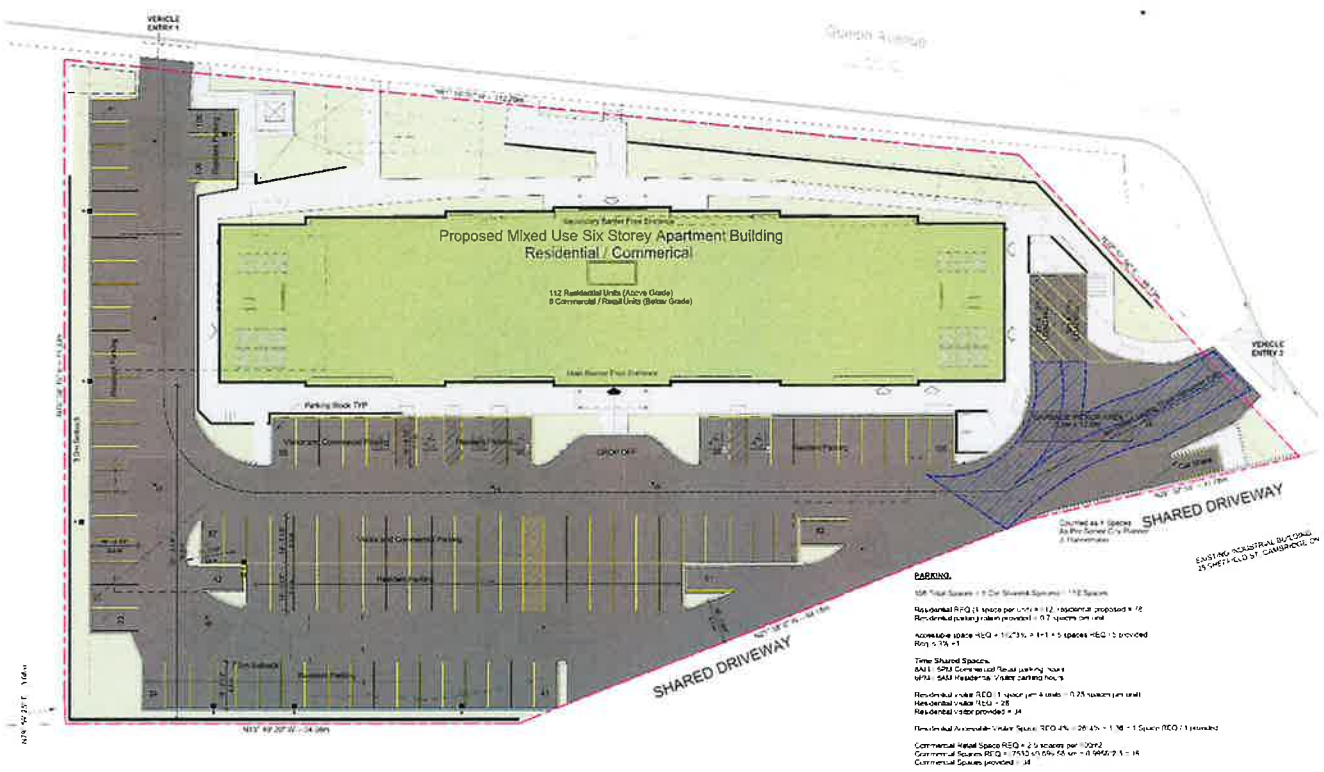


Photo 1 - Site Plan with access points highlighted

Vehicular Parking

The parking requirement for *multi-unit residential* is "*1 space per every unit*" plus "1 space for each 4 for dwelling units, or 1.25 spaces per unit resulting in 140 required spaces and 1 space for every 100msq of commercial space.

A total of 112 vehicle parking spaces are being proposed for all uses within this development, including 5 barrier-free spaces (see Appendix F) and 1 car share space (counts as 4 spaces). **To obtain 112 spaces on site we implemented a slight reduction in parking space size.**

Bicycle Parking

The City of Cambridge lists the following required rates for bicycle parking: 0.30 spaces/unit for long-term bicycle parking, and 0.05 spaces/unit for short-term bicycle parking, maximum 12, Minimum 2.

The zoning requirement for long-term bicycle parking in a Multiple Dwelling mandates 0.3 bicycle spaces per dwelling unit, totaling 34 required bicycle spaces and 6 short-term parking spaces.

As noted on the attached Site Plan Package and Transportation Impact Study, the proposed development will include 72 total bicycle parking spaces, which is in line with the City's bicycle parking rates (see Appendix D and Appendix F). A bicycle storage room will be located on the basement level, with 2 additional storage racks being located outside the building. (See appendix D, K,)

The Transportation Impact and Parking Study shows that at full build-out, this site will operate at acceptable levels of service. No intersection or traffic control upgrades are warranted to accommodate the proposed development.

The Transportation Impact and Parking Study did make note that the current site plan indicates a provision of 72 bicycle parking stalls, including 50 short-term spaces and 22 long-term spaces. The proposed short-term bicycle parking supply exceeds City requirements, while the long-term bicycle parking supply is theoretically deficient by 12 spaces. It is recommended required long-term bicycle parking spaces be provided on-site to further encourage use of cycling. We will review these options along with City comments.

3.6 Site Plan Control

Site Plan controls are in place in the City of Cambridge. The Site Plan Control process will begin for this Proposed Development following the approval of the proposed Zoning and Official Plan Amendments.

The proposed development can be seen in the attached Site Plan, Elevations, and Floor Plans (see Appendices B, D & G). These plans and drawings are preliminary at this time and will be further refined during the Site Plan Approval stage. For additional details on the overall site layout and building design choices for this proposed development, refer to the attached Urban Design Report.

4.0 Public Consultation Strategy

In accordance with the requirements of the Planning Act, a Public Consultation Strategy is to be provided which will outline opportunities for members of the public to be involved in the processing of the proposed Zoning By-law and Official Plan amendment applications.

As required by the Planning Act, the City of Cambridge will provide public notice of the amendment applications, and will hold a Statutory Public Meeting to discuss the subject application and to provide the opportunity for any individuals or property owners to listen to the development proposal, and to provide any verbal comments or feedback on the proposal if they wish.

4.1 Proposed Official Plan Amendment

The subject property is designated at Business Industrial. We are proposing to re-designate these lands to Low-Medium Residential in the City of Cambridge Official Plan along with a secondary Site-Specific Amendment that would permit an increased density to 139 units per hectare, as the maximum allowed density for the Low-Medium Density designation is 40 units per hectare.

The subject lands are located in a **designated Regeneration Area** in the City of Cambridge (see Map 6), which would permit for a density of 80 units per hectare.

4.2 Proposed Zoning By-law Amendment

The Site is designated M3 Industrial in the City of Cambridge Zoning By-law (see Map 3). A Zoning By-law Amendment is required to rezone the Site to C1RM1 zone with site-specific provisions. The redevelopment will provide for an increase in residential density, with a 112-unit *apartment house*. The apartment house dwelling type is not permitted in the M3 zone, triggering the requirement for a zone change. The proposal will also require a site-specific reduction in parking space size and to allow 112 spaces and a reduction to 26% landscaped area instead of the required 30% landscape area.

5.0 Summary of Technical Reports/Plans

5.1 Site Plan, Preliminary Elevations, Shadow Study, Massing Models and Floor Plans

Two Row Architect was retained to work alongside the land owner to complete the Building Designs and the Urban Design Brief for the proposed development. These designs consist of Preliminary Floor Plans, Elevation Drawings and Shadow Study. These drawings are to be reviewed in conjunction with the Urban Design Brief which also addresses the accessibility of the development. The full version of these Plans and Brief can be found in Appendix B, E and G attached at the end of this report.

5.2 Engineering/Civil

Len Girard, Civil Engineer, was retained to complete the following Reports and Plans for the proposed development, which can be found in Appendix C, H, I attached to this Report. Note that Len Girard passed away during this process and CJDL Consulting Engineers will be picking up this file. The items completed as part of the Engineering and Functional Servicing report are:

- Functional Servicing Report
- Preliminary Grading and Servicing Plans
- Proposed Sanitary and Water Supply
- Storm Water Management

For full reports please see Appendix C, H and I.

5.3 Landscaping and Tree Management Plan

Adesso Design Inc. was retained to complete the required Landscaping Plans in support of the proposed development, which is attached as Appendix J at the conclusion of this report. The purpose of this Landscaping Plan and Tree Management Plan is to illustrate the landscaping and tree management measures provided for the Site.

5.4 Lighting/Photometrics Plan

Mighton Engineering prepared a Lighting Plan to support the proposed development. This plan demonstrates the illumination levels and photometric layout for the site.

See Appendix K for the complete Lighting Plan.

5.5 Environmental Impact Study

The EIS is not required by the City, Region or GRCA.

5.6 Cultural Heritage Impact Assessment

ARA Heritage was retained to prepare a Heritage Impact Assessment of the subject lands and adjacent lands. The subject property is not listed or considered to be of interest but the neighbouring property is. The HIA, as attached as Appendix N, notes concern for potential vibration impacts to the adjacent site and has recommended some mitigation measures. See the attached report for additional information.

5.7 Wind Study

RWDI conducted a wind study to assess the potential impacts of a proposed 6-storey building on the surrounding neighbourhood. Modeling results indicate that minor wind impacts may occur on-site after construction, but the development is not expected to significantly influence wind conditions beyond the immediate vicinity.

See Appendix Q for the complete Wind Study.

5.8 Noise Study

HGC Engineering conducted a noise study on behalf of Landmark Homes to assess the impact of rail, road traffic, and adjacent noise sources. The study concluded that transportation noise can be mitigated through standard building assembly practices.

However, the study found that noise levels from adjacent industrial properties exceed the Class 1 Ministry of the Environment, Conservation and Parks (MECP) limits. Noise mitigation options for these sources were deemed unfeasible.

Based on these findings, we will request that the City modify the subject lands' zoning designation from Urban Area Class 1 to Infill classification, Class 4. This reclassification aligns with the City's Official Plan direction for this Regeneration Area, which is undergoing significant change.

For further details on the Noise Study, please refer to Appendix O.

5.9 Transportation Impact Study

Paradigm Transportation Solutions completed a Transportation Impact and Parking Study on behalf of Landmark Homes for 130 Guelph Ave. The study concluded that "With full build-out of the proposed mixed-use development, the operations at the study area intersections are found to be similar to future background traffic conditions. All intersections and traffic movements are forecast to continue to operate at acceptable levels of service and within capacity during both AM and PM peak hours under the 2031 horizon year."

The Parking study review provided rational and justification for the requested parking reduction. See Appendix F for the complete Traffic Impact Study.

5.9 Phase 1 & 2 Environmental Site Assessment and Remedial Action Plan

Chung & Vander Doelen Engineering Ltd. prepared and executed the Remedial Action Plan and we are currently waiting for the clearance letter from the Ministry.

See Appendix L for the complete Phase 1 & 2 ESA and Remedial Action Plan.

5.10 Urban Design Brief

Two Row Architect prepared the Urban Design Brief as part of the complete application submission. This report reviews the existing conditions and development of the site and impact to the surrounding area and dives into Chapter 5 of the Official Plan. Supporting the attached report, Appendix E, you will find visual content and rendering showing the built form.

6.0 Planning Policy Framework & Rationale

6.1 Provincial Policy Statement, 2024

On August 20, 2024, the Ministry of Municipal Affairs and Housing released the Provincial Policy Statement 2024 ("PPS"), which came into effect on October 23, 2024.

The PPS provides policy direction on matters of Provincial interest related to land use planning and development. In accordance with Section 3(5) of the Planning Act, all planning matters and council decisions are required to be consistent with the PPS. Additionally, Policy 6.1.1 of the PPS states that the document "shall be read in its entirety and all relevant policies are to be applied to each situation".

The excerpts below will list the PPS policies which apply to the development/Site:

2.1.6 *Planning authorities should support the achievement of complete communities by:*

a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and

c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.

Rationale: The proposed development/applications are consistent with the policies listed in Section 2.1.6 of the PPS. The proposal promotes efficient development and land use patterns by redeveloping a site located within a Regeneration Area and a neighbourhood in transition. The proposed development represents a smart increase in residential density, contributing to the provision of a range and mix of housing options in the City of Cambridge. The redevelopment of the Site will also have no negative effects on the environment or public health.

2.2 *Housing*

2.2.1 *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:*

a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and

2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

Rationale: The proposed development is consistent with the policies listed in Section 2.2.1 of the PPS. The redevelopment of the Site will assist the City of Cambridge in meeting its projected density targets, with a proposed 112-unit apartment building. The Site is located in a Regeneration Area that is located directly adjacent to the Fisher Mills residential neighbourhood and just outside the Community core area in the Cambridge Official Plan. The increase in residential density aligns with the City's planned vision for this neighbourhood over the long term.

2.3.1 Settlement Areas

2.3.1.1 *Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.*

2.3.1.2 *Land use patterns within settlement areas shall be based on densities and a mix of land uses which:*
a) efficiently use land and resources;
b) optimize existing and planned infrastructure and public service facilities;
c) support active transportation;
d) are transit-supportive, as appropriate; and
e) are freight-supportive

2.3.1.3 *Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.*

Rationale: The proposed redevelopment is consistent with the policies listed in Sections 2.3.1.1, 2.3.1.2, and 2.3.1.3 of the PPS. The Site is located within a Regeneration Area, and its location within an existing neighbourhood that is in transition, ensures that the residents will have access to in-place infrastructure and public service facilities. As discussed in Section 2.2 of this report, the location of the Site provides convenient access to transit options, with three bus stops within 100m of the subject lands. Active transportation options such as multi-use trails and bike lanes are also available within close proximity to the Site, and the core area of Hespeler Village is within walking distance. The proposal will provide for a sustainable, compact built form that efficiently utilizes the land available on the Site.

3.6 Sewage, Water and Stormwater

3.6.1 *a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;*
b) ensure that these services are provided in a manner that:

1. can be sustained by the water resources upon which such services rely;
2. is feasible and financially viable over their life cycle;
3. protects human health and safety, and the natural environment, including the quality and quantity of water; and
4. aligns with comprehensive municipal planning for these services, where applicable.

c) promote water and energy conservation and efficiency;
d) integrate servicing and land use considerations at all stages of the planning process;
e) consider opportunities to allocate, and re-allocate if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply;

3.6.2 *Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.*

Rationale: The proposed development prioritizes sustainable stormwater management consistent with the policies listed in Sections 3.6.1 and 3.6.2 of the PPS. Len Girard, Engineer was retained to prepare a Functional Servicing Report ("SWM Report"), and associated engineering plans which included grading, drainage, and proposed servicing information. The Functional Servicing Report notes that there are existing drains on Guelph Ave. and hydrants that service the subject lands.

Effective stormwater management practices will be utilized for the proposed development. For full details on the proposed stormwater measures, please see the report/plans completed by Len Girard, attached at the conclusion of this report (Appendices H and I).

Conclusions (*Provincial Policy Statement*)

To summarize, we are of the opinion that the proposed development/amendments align with the policies listed in the Provincial Policy Statement (PPS).

The redevelopment provides for efficient use of land within the designated Built-Up Area, increases the residential density of the Site sustainably, and prioritizes responsible stormwater management practices. The development will assist the Region/City in meeting the desired density targets and is consistent with PPS policies that look at settlement areas and environmental protection. This redevelopment demonstrates a smart approach to intensification, supporting the City of Cambridge's growth objectives while also adhering to Provincial directives.

6.2 Region of Waterloo Official Plan

The Regional Official Plan ("ROP") provides policy direction on land use planning in the Region of Waterloo, directing growth within the Region over a 20-year time frame. All planning decisions within the Region, including the proposed Official Plan and Zoning By-law Amendment for 130 Guelph Ave., must comply with the ROP.

The overall goal of the ROP is to promote balanced growth and contribute to the creation of complete communities by directing the majority of urban development towards the Built-Up designated areas. Map 3a of the ROP shows the Site within the Region's Urban Area, specifically within the *Built-Up Area (see Map 9)*.

The following section will list key policies and guidelines from the ROP. Justification will then be provided which demonstrates how the proposed development and applications align with these outlined ROP policies.

Chapter 2 Shaping Waterloo Region Urban Communities
2.B.2 Urban Area
The Urban Area is designated as shown on Map 9. This designation contains the primary Urban Areas of the Cities of Cambridge, Kitchener and Waterloo and also extends into portions of the Township of Woolwich. The lands included within this designation are intended to accommodate the majority of the Region's growth within the planning horizon of this Plan, and will be planned and developed in accordance with the policies in Sections 2.C, 2.D, and 2.G and other applicable policies in this Plan.

2.C.2 *Area Municipalities will establish policies in their official plans and other supporting documents to ensure that by 2015 and each year thereafter a minimum of 45 per cent of all new residential development occurring annually within the region as a whole will be constructed within the Built-Up Area.*

2.D Urban Area Development Policies

The Urban Area designation broadly identifies where the majority of the region's future growth will occur. This designation contains the physical infrastructure and community infrastructure to support major growth, including transportation networks, municipal drinking-water supply systems and municipal wastewater systems, and a broad range of social and public health services. It is also well-served by the existing Regional transit system, which is intended to be further enhanced through the introduction of rapid transit. For these reasons, lands within the Urban Area have the greatest capacity to accommodate growth and serve as the primary focus for employment, housing, cultural and recreational opportunities in the region.

Within the Urban Area, most of the region's future growth will be directed to Urban Growth Centres, Major Transit Station Areas, Reurbanization Corridors, Major Local Nodes and Urban Designated Greenfield Areas. The planned function and development provisions for each of these areas are outlined in the policies below. In general, these areas will be planned

to create a more compact urban form with a greater mix of employment, housing and services in close proximity to each other

2.D.1 General Development Policies

In preparing or reviewing planning studies, or in reviewing development applications or Site plans, the Region and/or Area Municipalities will ensure that development occurring within the Urban Area is planned and developed in a manner that:

(a) supports the Planned Community Structure described in this Plan;

(b) is serviced by a municipal drinking-water supply system and a municipal wastewater system;

(c) contributes to the creation of complete communities with development patterns, densities and an appropriate mix of land uses that supports walking, cycling and the use of transit;

(d) protects the natural environment, and surface water and groundwater resources;

(f) respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur;

Rationale: The proposed development of a 112-unit apartment building on the Site complies with the Region's urban intensification goals outlined in Section 2.B.2 of the ROP. It is located within the Urban Area and designated Built-Up Area, demonstrating a commitment to utilizing existing land instead of contributing to urban sprawl. The proposal aligns with the vision of the Urban Area as an area in transition and regeneration and should be looked at for growth. With the Site being situated adjacent to an existing neighbourhood just outside the core community area, the residents will benefit from having access to established infrastructure such as transportation networks, municipal services, and social amenities.

The proposal would add 112 new affordable residential units to the Built-Up Area of Cambridge, directly assisting the Region in meeting its density goal of providing a minimum of 45% of new residential development within this designated area, as outlined in Section 2.C.2 of the ROP.

The proposed development is also in conformity with the General Development Policies outlined in Section 2.D.1. The development proposes a wise increase in density in an existing neighbourhood, contributing to the creation of a complete community. The location of the Site on Guelph Ave. encourages multi-modal transportation such as walking, cycling, and transit. The proposal also demonstrates environmental responsibility by utilizing an existing land parcel, preventing unnecessary sprawl that could jeopardize natural resources.

Chapter 3: Liveability in Waterloo Region

3.A Range and Mix of Housing

Housing is a basic necessity of life and is an essential element to individual health and community vitality. The provision of a full and diverse range and mix of permanent housing that is safe, affordable, of adequate size and meets the

accessibility requirements of all residents, is important if the region is to maintain and enhance its quality of life. It also plays a key role in attracting and supporting a diversified and stable business environment.

3.A.2 *Area Municipalities will plan to provide an appropriate range of housing in terms of form, tenure, density and affordability to satisfy the various physical, social, economic and personal support needs of current and future residents.*

Rationale: The proposed development of a 112-unit apartment building directly contributes to the Region's goal of providing diverse housing options. By redeveloping a derelict industrial building to an affordable apartment building it will add density to the Built-Up Area without taking away additional green space or prime farm land. It further makes use of the existing services within the established neighbourhood. This approach aligns with the Region's objective of accommodating varied housing needs.

This development proposal demonstrates compliance with the Region's goal of addressing housing affordability and the efficient use of existing resources. Providing multi-unit rental housing within walking distance of existing amenities meets the evolving social and economic needs of the community while promoting a sustainable approach to the future growth of the Region.

4. Supporting Waterloo Region's Business Community

Much of Waterloo Region's high quality of life is attributable to its strong, diversified economy. Maintaining and enhancing economic strength in a globally competitive, knowledge-based economy demands that the Region collaborate with Area Municipalities and other private and public sector partners to ensure that Waterloo Region's economy is adaptable, innovative and creative. This effort will require ongoing support not only for manufacturing, but also for sectors such as: high technology; postsecondary education; automotive; advanced manufacturing; business/financial; biotechnology and life sciences; environmental engineering, planning and management; agriculture and food processing; logistics and transportation; and construction.

The policies in this Chapter recognize the Region's traditional economic development support roles including: the planning and management of infrastructure to address the transportation, water supply, wastewater and waste management needs of the business community; ensuring that there are adequate quantities of strategically located employment areas available to accommodate forecast employment growth; advocating for Provincial and Federal government support assistance for key initiatives; and providing stable, long-term financial support for the world-wide marketing of Waterloo Region.

This Plan recognizes the important relationship between quality of life and economic prosperity. Communities that are vibrant, environmentally healthy and culturally diverse are not only great places to live, but they also attract people, jobs and new investment. This vision is reflected in this Plan through a broad range of

policies that protect the environment, promote cultural heritage, coordinate reurbanization-oriented financial incentive programs and provide employment support services that help maximize the potential for employment and entrepreneurship.

4.D.5 *The Region will encourage new and renovated residential, office, industrial and commercial buildings and site design to be constructed to progressive environmental certification standards.*

Rationale: The proposed development will see the addition of newly created mixed-use building that will assist in providing employment and affordable housing providing long term financial support for the Region of Waterloo.

Chapter 8: Source Water Protection

Overall Goal: *Protect, maintain and, wherever feasible, enhance surface water and groundwater resources to ensure that a municipal drinking-water supply system continues to provide a sufficient quantity and quality of drinking-water.*

8.A.10 *Wellhead Protection Sensitivity Areas (WPSA) are classified from 1 to 8. This classification allows for varying degrees of management relative to the vulnerability of the underlying groundwater to contamination, the importance of the well to the capacity of the municipal drinking-water supply systems, as well as the length of time groundwater within the WPSA will take to reach the municipal drinking-water supply well.*

8.B ***De-icing Salts***

The Urban Area designation broadly identifies where the majority of the region's future growth will occur. This designation contains the physical infrastructure and community infrastructure to support major growth, including transportation

8.B.3 *The Region may require the owner/applicant to submit and implement Salt Management Plans in accordance with the Regional Salt Management Planning Implementation Guideline to the satisfaction of the Region for the following types of development applications:*

(a) plans of subdivision and zoning by-laws proposing new employment land uses and multiple unit residential development;
(b) plans of condominium for new development;
(c) plans of condominium in previously constructed buildings; or
(d) consent to create a lot for a multi-unit res. or employment land use.

Rationale: The proposed development complies with the policies outlined in Chapter 8 of the ROP. The subject lands are not within any WPSA Wellhead Protection Zone, the development will fully adhere to all relevant source water and de-icing requirements as confirmed by the completed Stormwater Management

Report (Appendix H), and Phase 1 & 2 Environmental Site Assessment (Appendix L).

The development does not engage in any activities prohibited under Policy 8.A for WPSA zones, and the proposal also complies with Policy 8.B which addresses the responsible use of de-icing salts. The noted Stormwater Management Report and Phase 1 & 2 Environmental Site Assessment detail the salt management practices to be implemented. These include:

- Employing a "Smart about Salt" certified contractor trained in best winter maintenance practices.
- Prioritizing plowing for safety and applying sand/salt only when icy conditions create hazards.
- Providing designated snow storage on an impermeable surface, with any liquid de-icers being stored off-site.
- Regular inspections and documentation for compliance, in accordance with the prepared Risk Management Plan

Conclusions (*Regional Official Plan*)

To summarize, it is our opinion that the proposed development and submitted planning applications are consistent with the policies and guidelines listed in the Region of Waterloo Official Plan. The proposed redevelopment is located on a Site within the Urban Area and Built-Up Area designations and is part of the Regeneration Area which is in transition from the industrial zoning. By introducing a mixed-use building with commercial and residential rental units into an established neighbourhood, the proposal supports the ROP's housing objectives and promotes a greater range of housing options within the Region.

6.3 City of Cambridge Official Plan (2012)

The City of Cambridge Official Plan (OP), approved on November 21, 2012, Sept 2018 Consolidation, serves as a policy document that guides land use within the City. It provides a framework for long-term growth and development to ensure that community needs are met. In the policies below, we will review the specific land use and development policies outlined within the OP.

The Site is located within the Built-Up Area as indicated on OP Map 1A: Urban Structure (see Map 4 attached) and is designated Business Industrial as per OP Map 2: General Land Use Plan (see Map 5 attached).

6.3.1 Proposed Official Plan Amendment

An Official Plan Amendment (OPA) is being requested to establish a Site-specific policy for the lands which would permit an amendment to allow for a mixed-use Residential / Commercial building with 112 affordable housing units, (139 units per hectare).

The Urban Growth Centre is to be planned to achieve a minimum gross density of 150 residents and jobs combined per hectare by the year 2031. The site is located in a Regeneration Area and is directly adjacent to the Hespeler Core area.

See the next section of the Report (Section 6.3.2) which contains a review of all applicable Official Plan Policies, as well as justification for how the proposed development and requested OPA aligns with the goals and guidelines listed in the City of Cambridge Official Plan.

6.3.2 Official Plan Policy Review

In the policies below, we will review the specific land use and development policies outlined in the OP that apply to the proposed redevelopment and requested Official Plan Amendment for 130 Guelph Avenue.

Chapter 2: Growth Management

2.1 Growth Management and the Urban Structure

1. *The policies of this Plan implement the Growth Plan for the Greater Golden Horseshoe (Provincial Growth Plan) and are intended to plan and manage growth in accordance with the complete community concept. Cambridge, as a complete community, will be a well-designed, compact vibrant city that provides:*

a) an appropriate mix of jobs;
b) a range of housing options;
c) convenient access to local services and community infrastructure including affordable housing, schools, recreation and open space; and
d) access to a range of transportation options including public transit.

Rationale: The proposed development speaks directly to the Growth Management and Urban Structure policies by addressing the need for a range of housing that will make use of existing services and infrastructure.

2.2 Objectives

The following objectives provide a foundation for the growth management policies of this Plan:

c) to direct and encourage new development within the Built-Up Area of the city where appropriate to accommodate projected population and employment growth;

e) to support a balanced approach to growth in which the focus for new development will increasingly be shifted from greenfield areas to intensification within the Built-Up Area;

f) to plan for compact urban development that maintains a balanced land supply, including residential, employment and commercial uses, and promotes mixed-use, transit-oriented development;

g) to encourage the continued development of the Galt City Centre, Preston Towne Centre and Hespeler Village as Community Core Areas of higher intensity and mix of land uses, promoting such elements as mixed use buildings, intensification, heritage conservation, social facilities, the reuse of existing buildings and infrastructure renewal;

h) to identify and promote areas for intensified, mixed use activities generally serving more localized functions;

I) to promote the principles of conservation and sustainability, including; the efficient use of energy and water; the intensification of development in the Built-Up Area, and the protection, enhancement or, wherever feasible and appropriate, restoration of the natural environment and cultural heritage resources;

Rationale: The proposed development complies with the objectives outlined in Section 2.2 of the Official Plan. The Site is located within the City's Built-Up Area, within a Regeneration Area, adjacent to an existing urban residential neighbourhood and the Hespeler Core Area, all with access to municipal infrastructure and services. Further, this development will assist the City in accommodating projected population growth within the established Urban Area and Built-Up Area boundaries.

Additionally, the proposed 112-unit mixed use apartment building will contribute to the City's objective of providing compact urban development that is in close proximity to active transportation options and public transit routes.

2.6 Built-Up Area

The Built-Up Area is identified on Map 1A through the delineation of the built boundary. The built boundary is a fixed boundary that identifies the limits of the developed Urban Area of the City of Cambridge as of June 16, 2006.

2.6.1 Intensification within the Built-Up Area

1. Future development within the City of Cambridge Built-Up Area will contribute to meeting or exceeding the Regional reurbanization target. By the year 2015 and for each year thereafter, a minimum of 45% of all residential development will occur within the Built-Up Area of the region as a whole. The City in collaboration with the Region will monitor development within the Built-Up Area.

2. Intensification is encouraged throughout the Built-Up Area of Cambridge, particularly within the following areas:

a) The Urban Growth Centre (identified on Maps 1A and 3);

b) Community Core Areas (identified on Maps 1A, 3, 4 and 5)

d) Regeneration Areas (identified on Maps 1A and 6);

6. Intensification within the Built-Up Area will be planned and designed to:

a) support vibrant neighbourhoods through the inclusion of a diverse and compatible mix of land uses, including residential and employment uses;

b) provide for a range and mix of housing that takes into account affordable housing needs;

d) support walking, cycling and transit;

f) generally achieve higher densities than surrounding areas;

g) ensure an appropriate transition of built form to adjacent areas; and

h) maintain, enhance or wherever feasible and appropriate, restore the natural environment.

8. Infill, intensification and redevelopment within existing neighbourhoods will be minor in nature and will be designed to respect existing character and provide connections and linkages where possible.

Rationale: The proposed development of a 112-unit mixed-use apartment building complies with the policies outlined in Sections 2.6 and 2.6.1 of the City of Cambridge Official Plan. The Site is located within the designated Built-Up Area, demonstrating a commitment to providing intensification within this area as encouraged by the OP. The proposed development will contribute to meeting or exceeding the Region's re-urbanization targets by providing an increased density.

The Site is located directly adjacent to and borders the Hespeler Core Area and is in a designated Regeneration Area which promotes the need for increased density (**see Map 4).** The proposed development borders the Hespeler City Centre (Community Core Area). This positioning offers a natural extension for higher-density zones, supporting the City's intensification goals outlined in Section 2.6.1 (2) b), and d). The proposed density of 139 units per hectare provides a natural blend from the low-density neighbourhood on Fisher Mills Road. **The proposed density of 139 units per hectare is less than in the Hespeler Core area.**

Rationale: Furthermore, the proposed development aligns with Sections 2.6.1 (6) and (8) of the OP. The proposed development of a 112-unit mixed-use apartment building provides a compatible form of residential intensification and commercial uses to the adjacent core area. The proposed building's scale and design will respect the existing neighbourhood character, and also assist in providing for a range of housing options in an area of the City with convenient access to public transit and active transportation options.

2.6.3 Community Core Areas

1. The Community Core Areas are historical central business centres in the city with specialized and diverse planned functions. Supporting the complete communities concept, these areas are planned to provide a wide variety of mixed uses including a range of housing, specialized commercial uses, office uses including major offices, institutional and community facilities, and the cultural hubs for the city

2. *The Hespeler Village Community Core Areas is designated on Maps 5. Community Core Areas are those areas which contain or will be planned to contain the following features and functions:*

a) their historical role as traditional community focal points;

b) a mix of residential, employment and institutional uses which enable people to live and work in close proximity;

c) enhanced transportation opportunities for pedestrians, cyclists and transit users;

d) development and land use patterns supportive of transit service;

e) a range of housing types and transit oriented development;
f) conservation and preservation of cultural heritage resources;
g) integration of the Grand River and its tributaries as a multi-purpose resource, recognizing its designation as a Canadian Heritage River;
h) opportunities for unique experiences, such as cultural events, recreation, and specialty shopping and dining, in support of tourism and other functions;
i) maintenance, enhancement or wherever feasible and appropriate, restoration of the natural environment; and
j) approved Community Improvement Areas giving high priority to the location and upgrading of municipal services and facilities in the Community Core Areas.

3. *The City will recognize and encourage the use of the Community Core Areas as:*
a) areas which offer residential, employment, institutional, commercial, open space and cultural uses and activities;
b) specialized shopping areas, providing goods and services to customers within and outside of Cambridge;
c) areas of concentrated and mixed land uses which requires the application of such key elements of urban design, cultural heritage resources, natural environment conservation, a well-linked transit oriented and pedestrian transportation network, and development that is designed to reflect the character of the area and the concept of complete communities;

Rationale: The proposed development borders the Hespeler Core Area and is in a Regeneration Area, both of which support and direct intensification and growth. Being a mixed-use development, this not only addresses the need and direction for intensification in the Regeneration Area but will also round out the development with increased commercial space complimenting the core area.

2.7.3 Regeneration Areas

1. Regeneration Areas are areas within the city where a transition of use from one use, such as industrial to another use is anticipated during the planning horizon of this Plan. Regeneration Areas are identified on Maps 1A and 6.
2. Regeneration Areas will be the subject of planning studies to determine appropriate land use designations. Until appropriate Official Plan amendments are in effect, permitted uses are deemed to conform to this Official Plan.
3. For the purposes of Policy 2.7.2.1, Regeneration Areas are not considered to be employment areas. Applications for official plan amendments to expand the range of uses from industrial to other appropriate

land use designations for sites within the Regeneration Areas will be considered in accordance with the policies of this Plan

Rationale: The proposed development is located in the Regeneration Area and this area has already seen changes from the current industrial designations. As the Community Core Area of Hespeler expands and increases in density, the chance for nuisance complaints over noise, dust, odour, and traffic also increases. This industrial-to-residential development aligns directly with the Official Plan and will conform to its policies and desired direction.

2.8 Residential Lands

2.8.2 Range and Mix of Housing Types

1. *The City will plan for a range and mix of housing that is affordable, accessible, and safe incorporating Crime Prevention Through Environmental Design principles, and will accommodate the varying needs, abilities and economic resources of Cambridge residents.*

2. The City will encourage developers to make housing accessible and adaptable to people with disabilities and may require that a proportion of dwellings in residential developments and redevelopments be accessible and adaptable to people with disabilities, generally in keeping with the proportion such people represent in the City of Cambridge and in accordance with the Accessibility for Ontarian's Disability Act.

3. The City will ensure the creation of 45% of new housing units through infill, conversion, intensification and the redevelopment of Built-Up Areas of the City, particularly in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and MTSAs.

4. The City may allow for appropriate reductions in off-street parking requirements associated with the residential component of mixed use developments, to reflect the opportunities for the shared use of the parking spaces and in proximity to Major Transit Station Areas.

5. The City will encourage the inclusion of a compatible residential component in the development of commercial projects in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors, Major Transit Station Areas, or in residential communities.

6. The City will promote maintaining an adequate supply of both ownership & rental housing stock to meet the varying needs of City residents by:

a) encouraging residential intensification and the development of multi-unit residential development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and MTSAs;

b) providing opportunities for the development of smaller lot single and semidetached dwellings, plexes, townhouses and apartments; and

c) encouraging the construction of affordable rental and ownership housing.

Rationale: The proposed development complies with the City's policies for Residential Lands as outlined in Section 2.8 (subsection 2.8.2) of the City Official Plan, which discusses the requirement to provide for a range and mix of housing types in residential areas. By introducing a new residential development within the Built-Up Area, adjacent to the Core Area and within a Regeneration Area the proposal directly contributes to meeting the City's target of 45% of new housing units coming from infill and intensification. The proposed units will have a mix of unit types and sizes and will also be accessible.

The redevelopment complies with Section 2.8.2 by proposing intensification/infill on a Site in close proximity to the Urban Growth Centre and Hespeler City Centre and a Regeneration Area to the immediate south. The addition of new rental units assists in the provision of a range of housing types in the City to accommodate the varying needs of residents.

2.8.3 Residential Densities

1. The City will allow compatible higher density residential development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors, and Major Transit Station Areas and high density residential designations to support and ensure viability of existing and planned transit service levels.

3. The following are the City's minimum and maximum residential densities and heights in specified areas. Residential densities in residential designations are subject to Policy 8.4.6.3.

Table 3: Minimum and Maximum Residential Densities and Heights FSI – Floor Space Index (see glossary for graphic depiction)

Regeneration Areas:	*MINIMUM Density 0.5 FSI, Height 2 storeys*
	MAXIMUM Density 2.0 FSI Height 8 storeys

Rationale: A new 6-storey affordable housing apartment building, meets the intent of policy 2.8.3 and is in alignment with the Regeneration Area minimum and maximum density policies.

Chapter 5: Urban Design

The City of Cambridge is committed to a high standard of urban design. All development within the city is expected to demonstrate a high standard of urban design to the satisfaction of the City that supports the creation of a unique identifiable space while respecting and enhancing our cultural and natural heritage and our unique identity. The urban design policies in this Plan apply to all development within the city.

5.7 Site Development and Buildings

1. *Development will be:*

a) compatible in terms of massing and scale with the existing and planned streetscape; and
b) provide appropriate transitions in height to adjacent buildings.

2. Buildings generally will be situated at or near the street edge to frame the street and will have compatible front yard setbacks with adjacent buildings.

3. Blank building walls are discouraged along street frontages. Unless there is no other feasible alternative, active facades will be required in the design and treatment of buildings at street edges and intersections and should include features such as transparent windows and public entrances facing the street.

4. Building materials and architectural features for development or site/building improvements within the Community Core Areas will be respectful of the local context.

5. Site layout shall incorporate pedestrian walkways and connections to encourage and enhance walkability and access. Pedestrian connections on site will connect directly with public sidewalks and transit stops unless there is no other feasible alternative.

6. Placement of outdoor lighting will complement the building design and prevent or minimize impacts on the night sky and adjacent properties. The impact of lighting will be reviewed through the site plan approval process.

7. Pedestrian scale lighting shall be provided to accent walkways, steps, ramps, building entrances, building parking facilities and transit stops.

8. Where possible, servicing, loading, waste storage areas and building utilities/mechanical equipment will be located internal to the building or to the rear of the building and will be screened from view from adjacent streets

5.8 Sustainable Design

1. Energy efficiency and sustainability is encouraged in neighbourhood, Site, building and roof design through the use of conservation and renewable energy systems and practices and low impact development stormwater management.

5.11 Parking

2. The design and layout of surface parking will consider the following:
a) location to the rear or side of the building;
b) screening and buffering from public streets;
d) safe pedestrian movement;
e) pedestrian oriented lighting;
f) sustainable design; and
g) bicycle parking and movement.

5. Bicycle parking should be provided in close proximity to building entrances.

Rationale: The proposed development aligns with the City's Urban Design policies listed in Chapter 5 of the Official Plan. As required by Section 5.11(2) b), the proposed landscaping will provide sufficient screening and buffering from the public street and adjacent properties (see Appendix B, J)

The proposed site layout maintains compatibility with the existing streetscape in terms of massing and scale by making use of the existing elevation and blending the height of the building into the existing slope. Making use of the existing topography and building into the slope help to provide for an appropriate transition to surrounding buildings, which range from 1-2 storeys. Additionally, the proposed pedestrian walkway and bike racks near the building entrances directly promote walkability and access.

For more information, see the Urban Design Brief as prepared in conjunction with Two Row Architect. * (Appendix E)

Chapter 8: Land Use Policies and Designations

8.3 Community Core Areas Designations

1. The Community Core Areas as designated on Maps 2, 3, 4, and 5 may be developed and used for a concentration of mixed uses in conformity with the provisions of this Plan, including:
a) government services, public services and facilities;
b) commercial and retail (excluding adult entertainment establishments);
c) major offices and offices;
d) institutional, recreational, social and cultural facilities;

2. In order to encourage the development of the Community Core Areas in compact forms, the City may exempt a development from providing all or a portion of private offstreet parking facilities where such parking is not required or adequate alternative parking facilities are or will be made available

Rationale: The proposed development is in a Regeneration Area and it borders the growing core area of Hespeler. Some of the above policies should be considered in this development like allowing mixed commercial and institutional uses. Further consideration should be given to allow shared parking between the commercial and residential uses and an overall reduction in parking requirements. See the attached Traffic Impact and Parking Study. (Appendix F)

8.4 Residential
8.4.1 Affordable Housing

1. The City recognizes the importance of affordable housing and will encourage the development of affordable housing and provide opportunities for the development of affordable housing through:

a) permitting mixed-use development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and Major Transit Station Areas;
b) promoting the inclusion of a residential component in commercial development; and
c) encouraging the development of community housing and affordable private sector housing that is aimed at meeting the needs of lower income residents.

2. Where a development application proposing residential uses is submitted for a site containing two hectares or more of developable land, the City will require, wherever appropriate, a minimum of 30% of new residential units to be planned in forms other than single-detached and semi-detached units, such as town homes and multi-unit
residential buildings.

3. New residential development will include a minimum number of affordable housing units based on the targets established in the Region's Community Action Plan for Housing.

This proposal development aligns directly with the above policies.

Rationale: The proposed development complies with Section 8.4.1 of the Official Plan which outlines regulations for the provision of affordable housing. The proposed mixed-use development is for 112 units of designated affordable housing and ground-floor commercial uses and it will contribute to meeting the City's affordable housing goals. By increasing density in a well-serviced area, the project supports the efficient use of land and infrastructure.

It is the full intent of Landmark Homes to process this development application as affordable housing. The major issue at this time is that we cannot enter into any agreements, apply for funding or get relief from expenses until we are in alignment with planning policies.

Landmark homes understands that the following polices all support affordable housing.
- Regional Strategic Plan
- 10-Year Housing and Homelessness Plan
- Building Better Futures Framework
- Region of Waterloo Official Plan

We understand that in order for affordable housing to fulfill its purpose of being affordable to those who require rent prices lower than the regular market provides, a mechanism should be in place to ensure the units remain affordable and establish income levels of the households who can rent or own the homes.

We have met with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability. We are in agreement and ready to enter into a contract with the City and/or Region to secure rent levels that are considered affordable according to the Regional Official Plan.

8.4.2 Residential Compatibility

1. The City will encourage development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors, Major Transit Station Areas and in residential communities which is compatible with the location, density and other characteristics of neighbouring land uses. Factors to be taken into consideration in assessing the compatibility of development include:

a) the density, scale, height, massing, visual impact, building materials, orientation and architectural character of neighbouring buildings and the proposed development;
b) the conservation, protection, maintenance and potential enhancement of the natural environment and cultural heritage resources;
c) the continued viability of neighbouring land uses;
d) pedestrian and vehicular movement and linkages, as well as parking requirements and design in both existing development and proposed developments;
e) landscaping, setbacks, sun and shadow effects, wind effects, signage, lighting and buffering of existing development and proposed developments;

2. Infill, intensification and redevelopment within existing neighbourhoods will be minor in nature and will be compatible with the surrounding neighbourhood character. The following will be considered in assessing whether the development is minor in nature:

a) comparable building height, generally within two storeys of neighbouring buildings;
b) massing and scale;
c) similar lot coverage and side yard setbacks to neighbouring housing;
d) maintaining the predominant or average front yard setback;
e) built form that respects the façade details and materials of neighbouring housing, including garage width, porches, screening and architectural details;
f) transportation implications; and
g) appropriate parking arrangements and traffic movement.

3. The location and massing of new buildings in the residential designations must be compatible with the surrounding land uses. The City will require Sites to be designed with transition between areas of different intensity and scale.

Rationale: The proposed development complies with the Residential Compatibility policies outlined in Section 8.4.2 of the Cambridge Official Plan. The proposed massing and scale of the 6-storey building remain consistent with neighbouring

building heights, and the chosen building materials will be selected to respect the façade and architectural character of the neighbourhood.

Additionally, the location of the Site adjacent to higher-density zones (Regeneration Area, Urban Growth Centre, and Community Core Area) fosters a successful transition, illustrating compliance with Official Plan Section 8.4.2 (3). The 6-storey, 112-unit apartment house proposal provides a step-up in density from these areas, integrating into the existing residential neighbourhood. Vehicular and pedestrian movements have been carefully considered, and site elements have been located in a manner that minimizes any impacts on the surrounding neighbourhood.

8.4.6 Residential Designations

2. The City recognizes three residential designations:
a) Low/Medium Density Residential;
b) High Density Residential; and
c) Rural Residential.

3. The following residential density targets for new development in residential designations will be implemented through such means as the approval of plans of subdivision as well as Site specific development applications:
a) a maximum of 40 units per gross hectare for the Low/Medium Density Residential designation, excluding only provincially constrained environmental areas as defined in the Regional Official Plan and secondary units; and

5. For infill, intensification and redevelopment within any residential designation compatibility criteria in Policy 8.4.2.2 shall apply.

9. Lands in a Low/Medium Density Residential designation where a municipal water supply and municipal wastewater systems are currently available may be developed and used for uses such as single detached dwellings, townhouses and/or walk-up apartments.

Rationale: The proposed development complies with the Residential Designation policies outlined in Section 8.4.2 of the Official Plan. While the Site is designated Industrial in the OP, the proposed Official Plan Amendment (OPA) and Zoning By-Law Amendment to re-zone the lands from M3 to C1RM1 to accommodate both the commercial units and the 112 residential units over the 0.79-hectare Site. The strategic location of the Site being in a Regeneration Area and adjacent to the Hespeler City Centre (a Community Core Area) strongly justifies the increase in density.

The proposal also complies with Section 8.4.6 (9) of the OP, as the Site's access to existing municipal water and sewer infrastructure makes it highly suitable for the walk-up *apartment house* use.

8.6.1.3 Neighbourhood Commercial

1. The Neighbourhood Commercial designation applies to commercial developments with a maximum gross leasable area of 13,935 m2. The planned function of these developments is to provide retail and service uses that serve the daily and weekly needs of residents living in the surrounding neighbourhoods. Lands designated Neighbourhood Commercial are generally anchored by a supermarket, grocery store or drug store.

2. Lands designated Neighbourhood Commercial must be located on an Arterial Road or Collector Road as shown on Map 7A

Rationale: The proposed commercial component of this development meets the intent of the Neighbourhood Commercial Designation. With the commercial units being located inside the proposed building, the services provided serve the needs of the residents that live nearby and appeal to niche services or businesses. Guelph Ave is a collector road and part of the Planned Transit network.

Conclusions (*City of Cambridge Official Plan*)

To summarize, it is our opinion that the proposed development and requested OPA align with the guidelines listed in the Official Plan. The development's focus on intensification within the Built-Up Area supports the City's goals of accommodating future population growth within its existing boundaries.

The project prioritizes a compatible building design and Site layout that respects the surrounding neighbourhood character. The proposed building, landscaping, and Site layout all work to efficiently integrate the development with the neighbourhood. Mixed housing types and sizes contribute to the City's goal of providing diverse housing options, and supporting affordability within the rental market. This mixed-use building will make use of the existing infrastructure and transit while shared parking will make wise use of the parking lot.

The proposed Official Plan Amendment to increase the density of the Site from 40 UPH to 139 UPH in the Low-Medium Density Zone is further justified due to the strategic location of the Site being adjacent to Hespeler City Centre and within a Regeneration Area. The requested increase in density provides a smart step-down in density between the Hespeler Core areas and promotes efficient land use.

6.4 City of Cambridge Zoning By-law 150-85

The City of Cambridge Zoning By-law No. 150-85 is the current in-force Zoning By-law, and the Site is currently zoned as M3 Industrial in the By-law.

6.4.1 Proposed Zoning By-law Amendment

A Zoning By-law Amendment is being proposed to rezone the property from the M3 Zone, Industrial to the RM1 zone Residential and C1 zone Commercial (C1RM1), with site-specific provisions. The zone change is necessary in order to allow for the 6-storey apartment house with commercial uses on the ground floor. City Planning Staff reviewed the proposed C1RM1 zoning and have noted that they are supportive of the rezoning of the lands to multi-use residential and commercial designation.

See the following table, which indicates how the proposed development complies with the RM1 zone. The C1 zone specifications for site development are nil in the City of Cambridge Zoning By-Law 150-85, as such we have followed the RM1 designation specifications below.

	Required	**Provided**
Minimum Lot Area	N/A	8080 m^2
Min. Lot Frontage	30.0 m	48.13 ±m
Front Yard Setback	6	6.5m
Interior Side Yard Setback	3.0 m *(for first two storeys)* *9.0 m (for 6th storey)*	38.8m
Rear Yard Setback	3.0 m *(for first two storeys)* *9.0 m (for 6th storey)*	16.8m
Exterior Side Yard	4.5m	5.43m
Gross Floor Area	50.0 sq.m *(per one bedroom unit)*	91.18 ±m^2 per residential unit
Max. Building Height	25m	23.3m
Min. Landscaped Open Space	30%	**26.8%**
Parking *(standard)*	The parking requirement for *multi unit residential is "1 space per every unit"* plus "1 space for each 4 for dwelling units, or 1.25 spaces per unit.	**112 parking spaces, including 5 barrier-free spaces**
Max. Density (Zoning By-law)	250 units per hectare (UPH)	139 UPH
Bicycle Parking	68	72

Zoning By-law Analysis / Compatibility

In summary, it is our opinion that the proposed Zoning By-law Amendment to change the designation from M3 to C1RM1 with site-specific provisions is appropriate, as it follows the planned land use structure as indicated in the City Official Plan, and aligns with the Regional and City Official Plan policies for the Regeneration Areas

7.0 Conclusions

This Planning Justification Report has been prepared in support of an Official Plan Amendment Application and a Zoning By-law Amendment application for 130 Guelph Avenue in the City of Cambridge, to facilitate the development of a 6-storey mixed-use building. This report has outlined the planning rationale for the proposed 6-storey mixed-use building, establishing the suitability of the project for the site and surrounding neighbourhood.

The proposed development emphasizes increased density, sustainability, and the creation of complete communities, while efficiently using underutilized land that is located just outside of the City's designated Core Area, and recognized as a Regeneration Area, thus contributing to smart intensification.

Transitioning from the existing zoning designation of M3 Business Industrial, to the C1RM1 Mixed-Use Residential Commercial zone, is consistent with the vision of the City of Cambridge Official Plan, further demonstrating the alignment of this project with planning policy objectives. The inclusion of 112 affordable rental home units alongside commercial uses presents a smart approach to urban development, offering a diverse mix of land uses that contribute to the creation of a complete community.

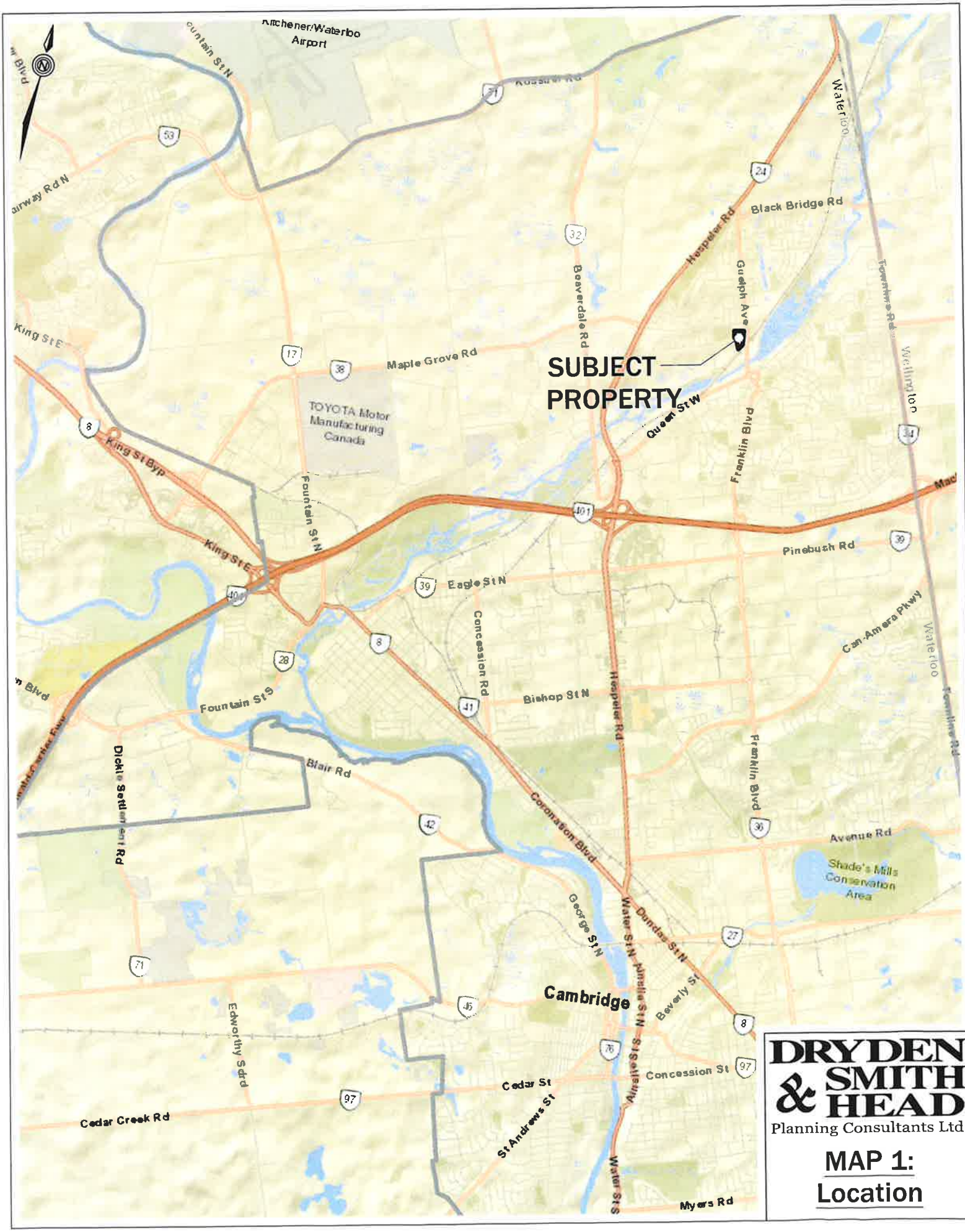
From a design perspective, the proposed site layout fosters a strong relationship between the building and the street, creating an appealing streetscape and a human-scaled design.

The requested amendments and proposed development of the 6-storey mixed-use building bridge the gap between policy directives and practical urban development. This project complies with provincial and local planning policies, and also contributes to the creation of a vibrant and sustainable neighbourhood that prioritizes increased density and a diverse range of land uses. It is a thoughtful response to the community's needs, providing quality housing units and attractive commercial opportunities.

It is our belief that this development proposal will serve as a positive and valuable addition to the City of Cambridge. We appreciate your support of this application.

Respectfully submitted,

Andrew Head,
Partner
Dryden, Smith & Head
Planning Consultants Ltd.



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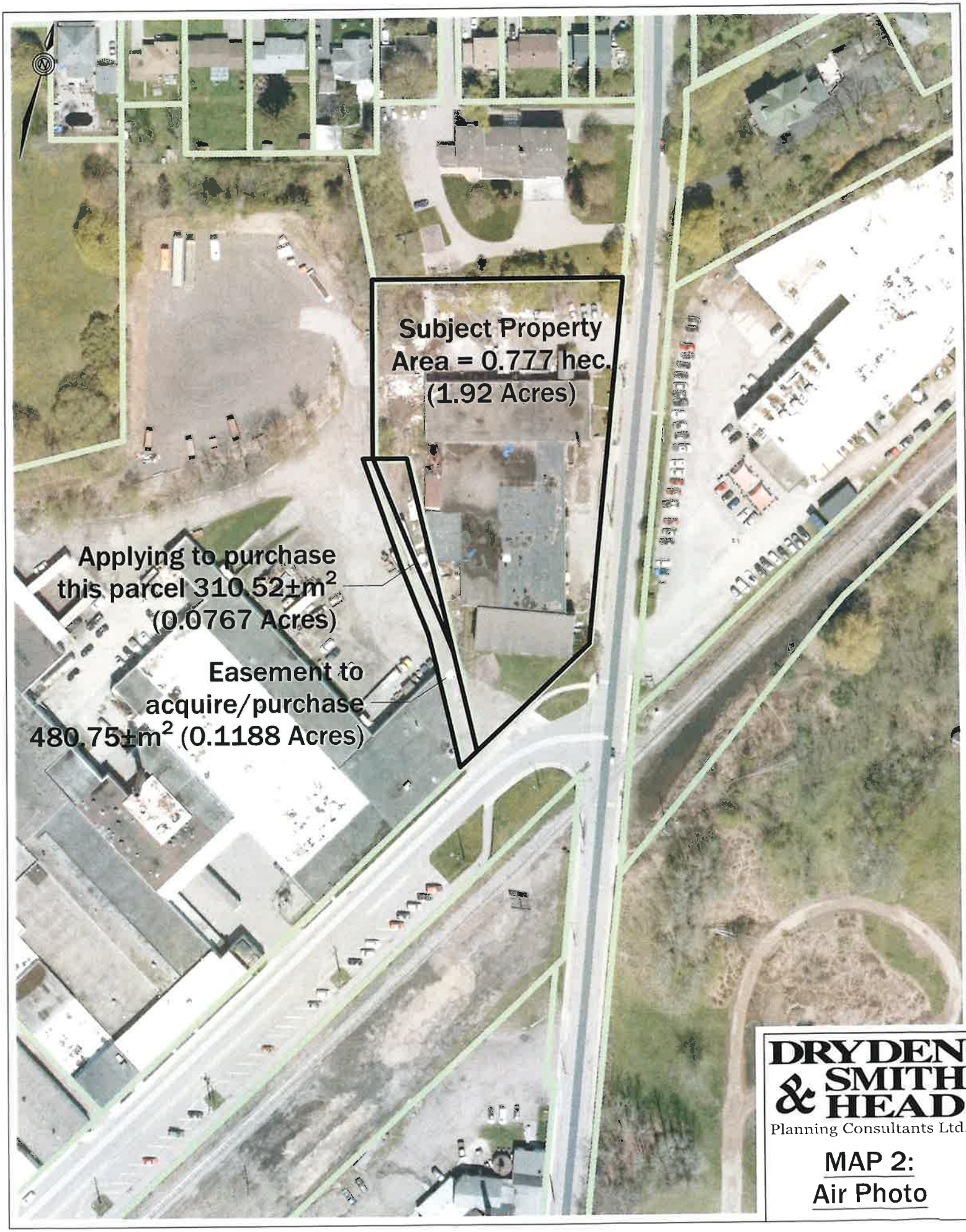
MAP 1: Location



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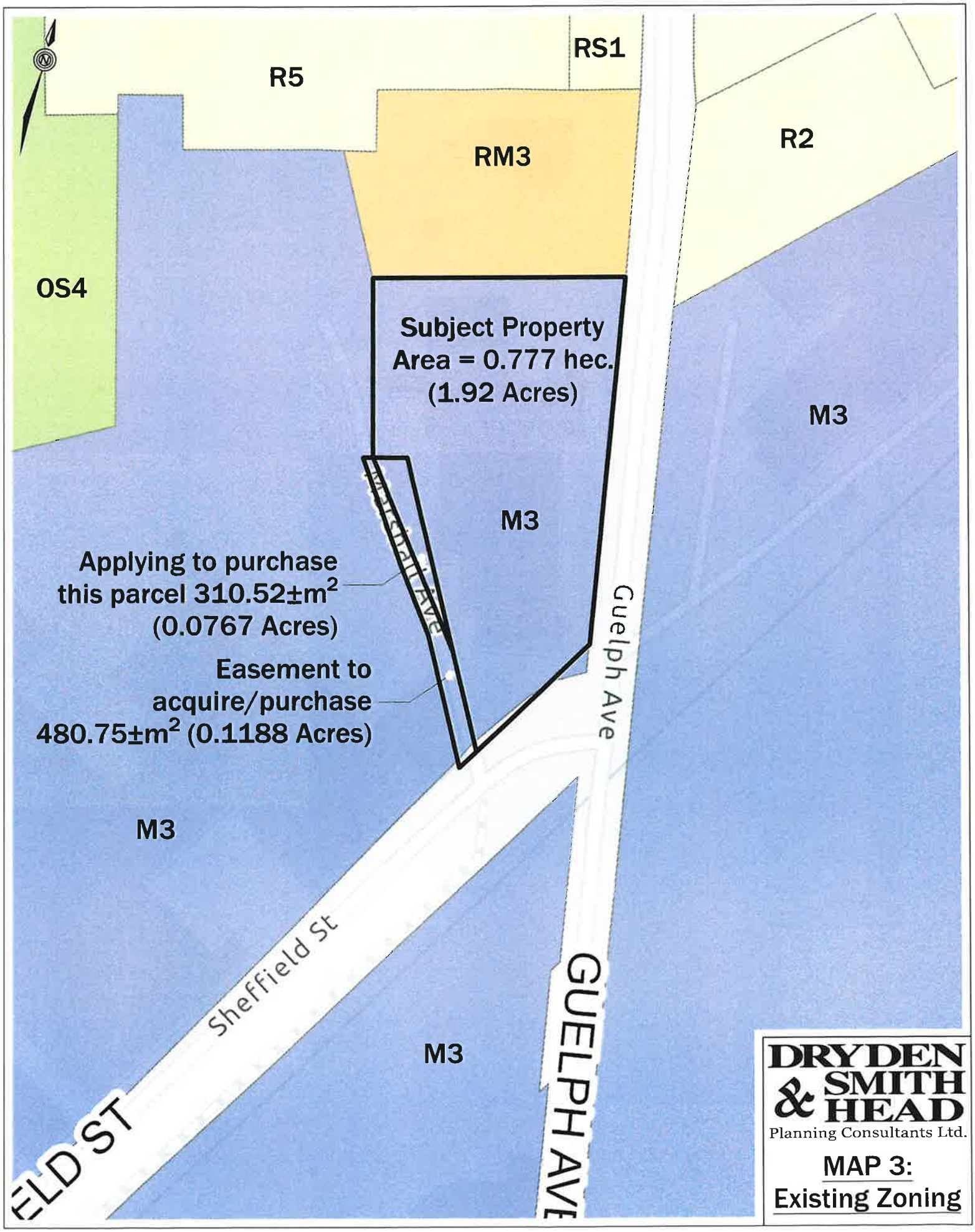
MAP 2:
Air Photo


RS1
R5
RM3
R2
OS4
Subject Property
Area = 0.777 hec.
(1.92 Acres)
M3
M3
Applying to purchase
this parcel 310.52±m²
(0.0767 Acres)
Easement to
acquire/purchase
480.75±m² (0.1188 Acres)
Guelph Ave
M3
Sheffield St
M3
ELD ST
GUELPH AVE
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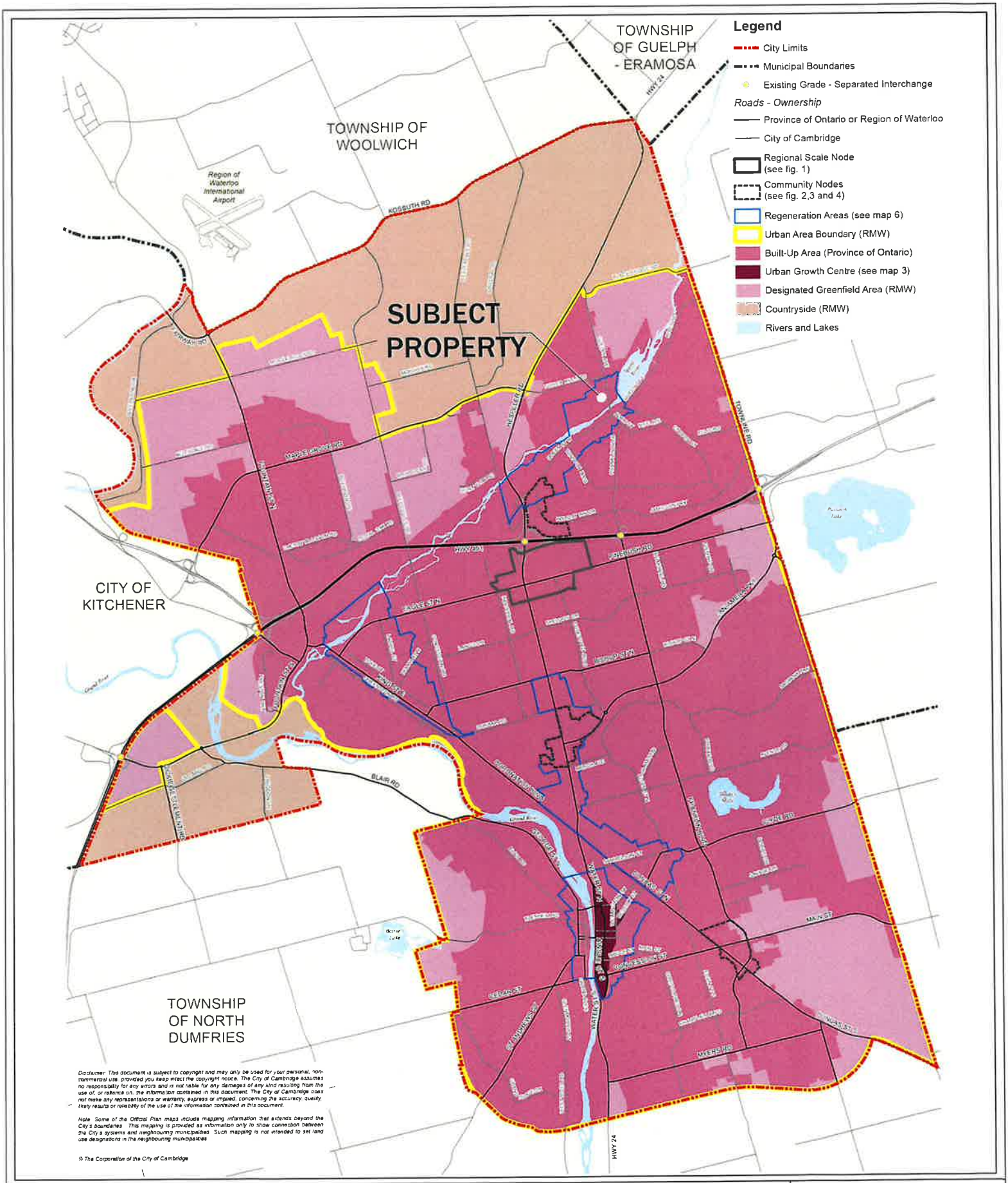
MAP 3:
Existing Zoning



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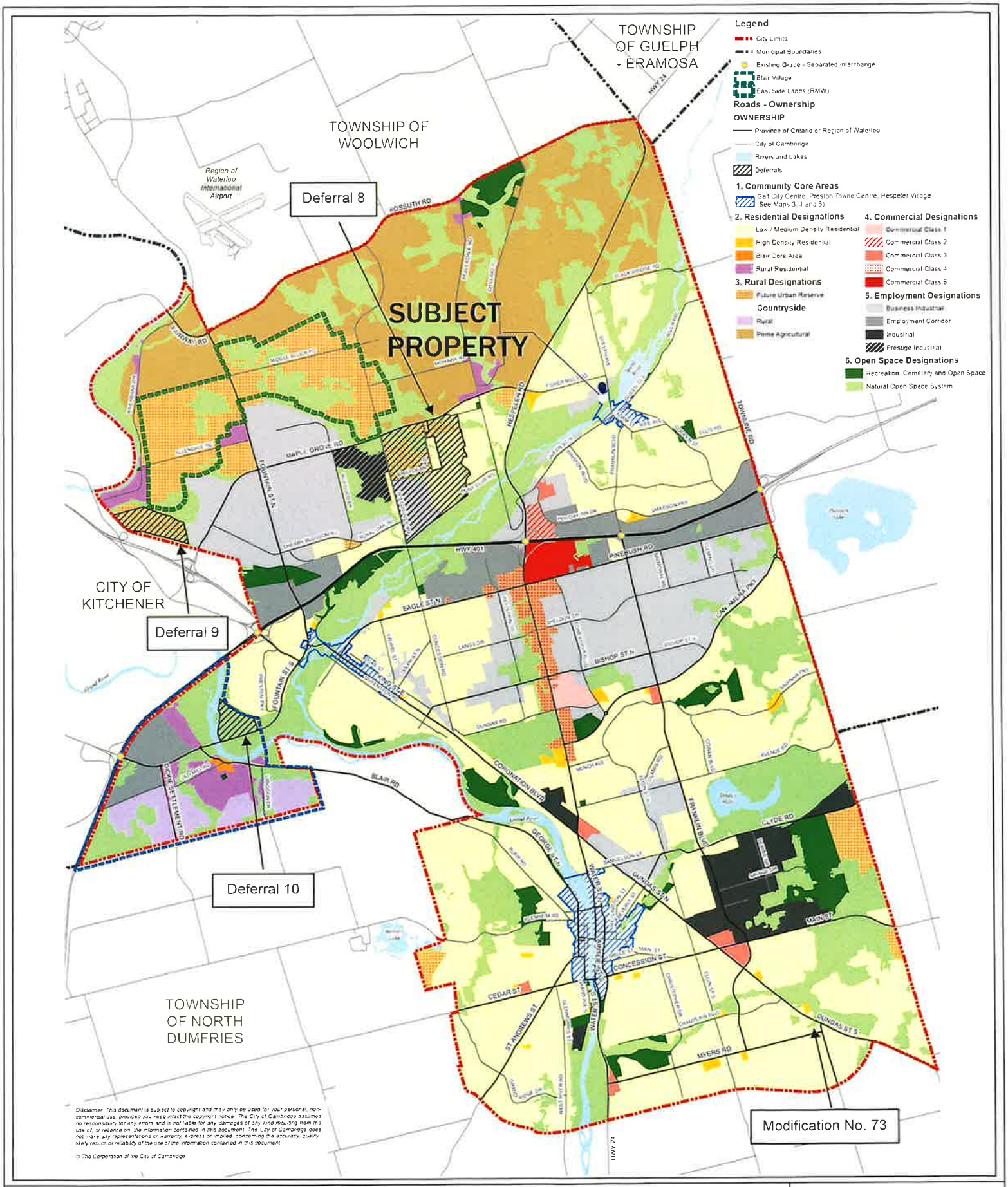
MAP 4:

Cambridge Official Plan, Urban Structure



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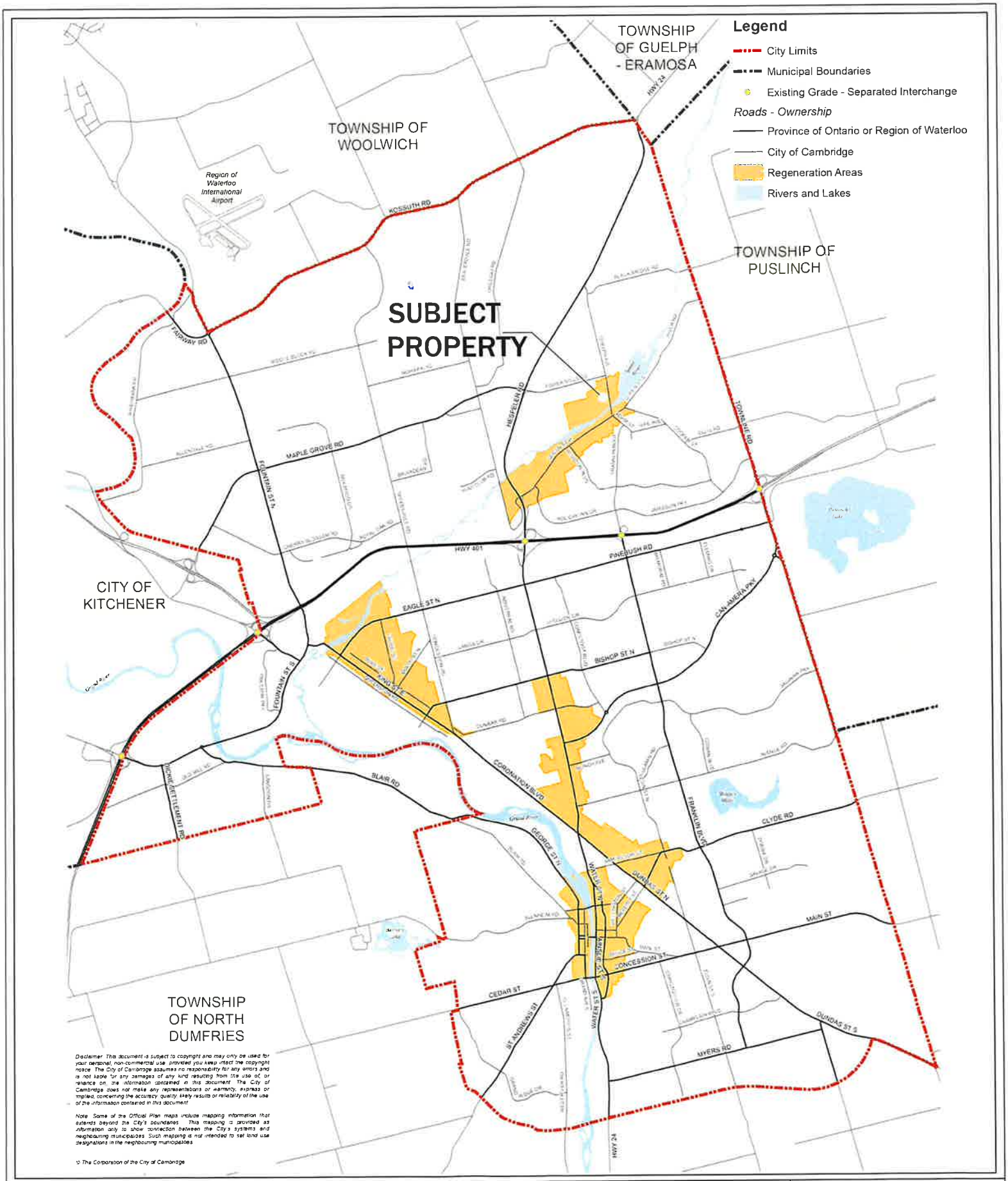
MAP 5:

Cambridge Official Plan, General Land Use



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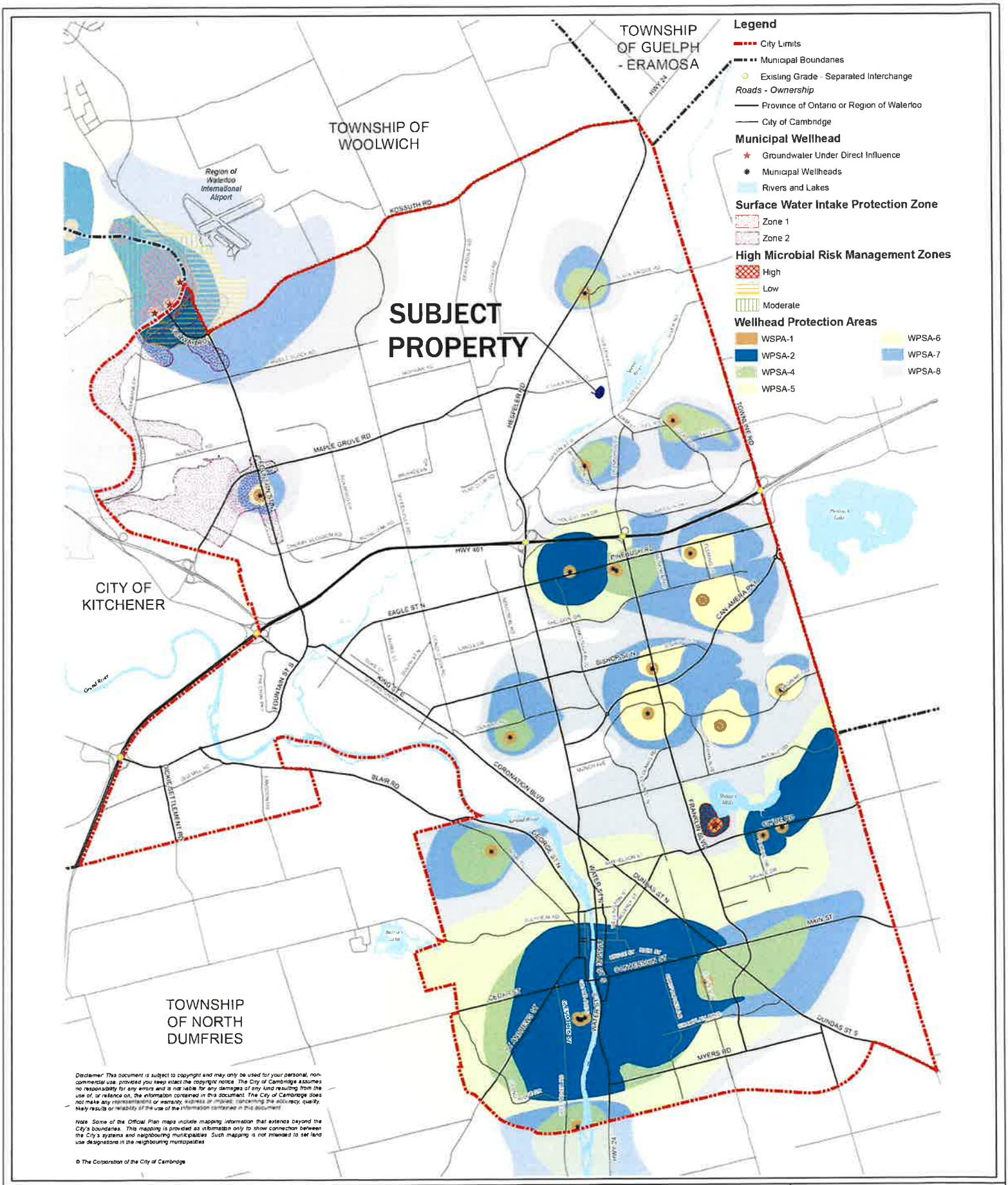
MAP 6:

Cambridge Official Plan, Regeneration Areas



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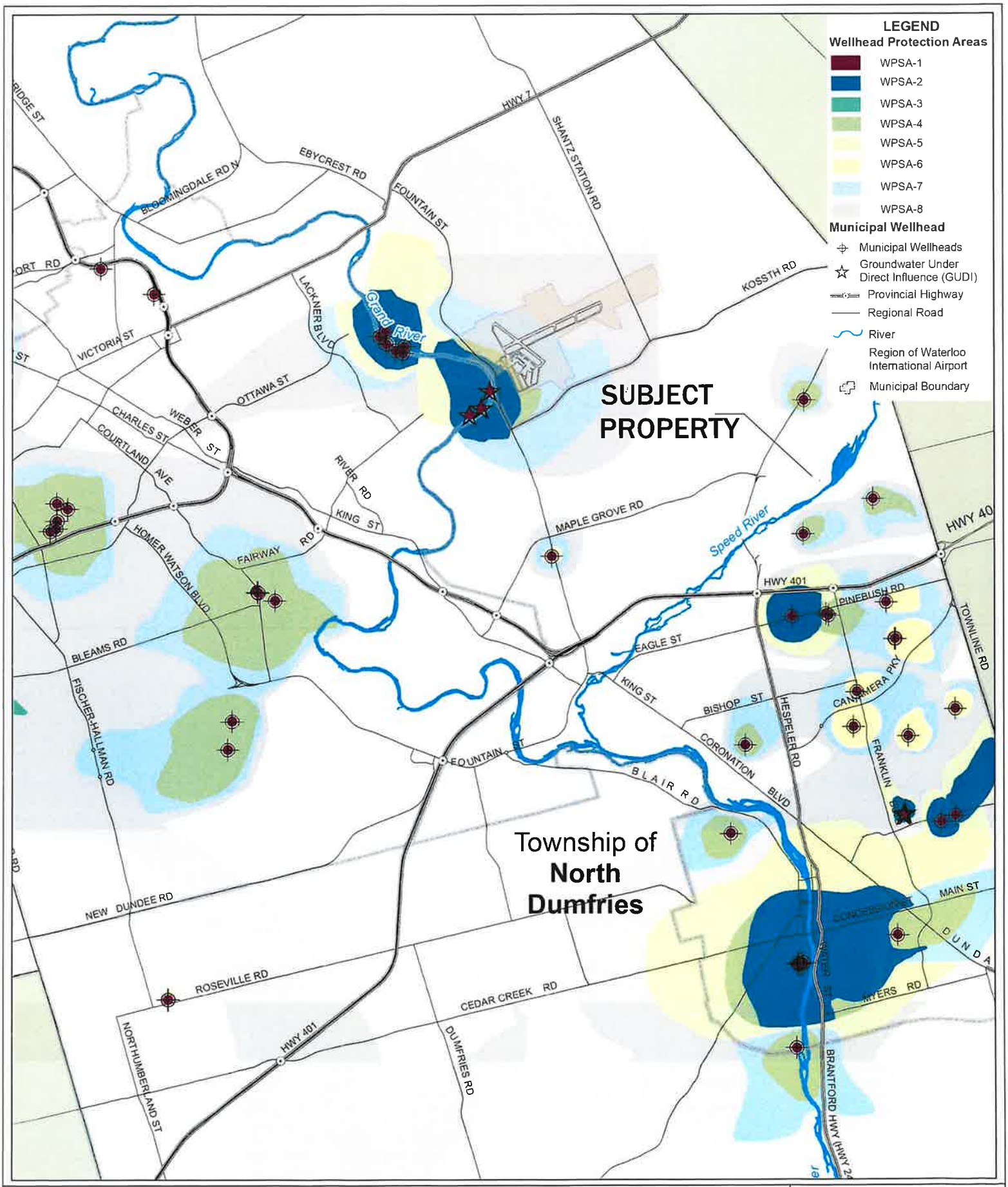
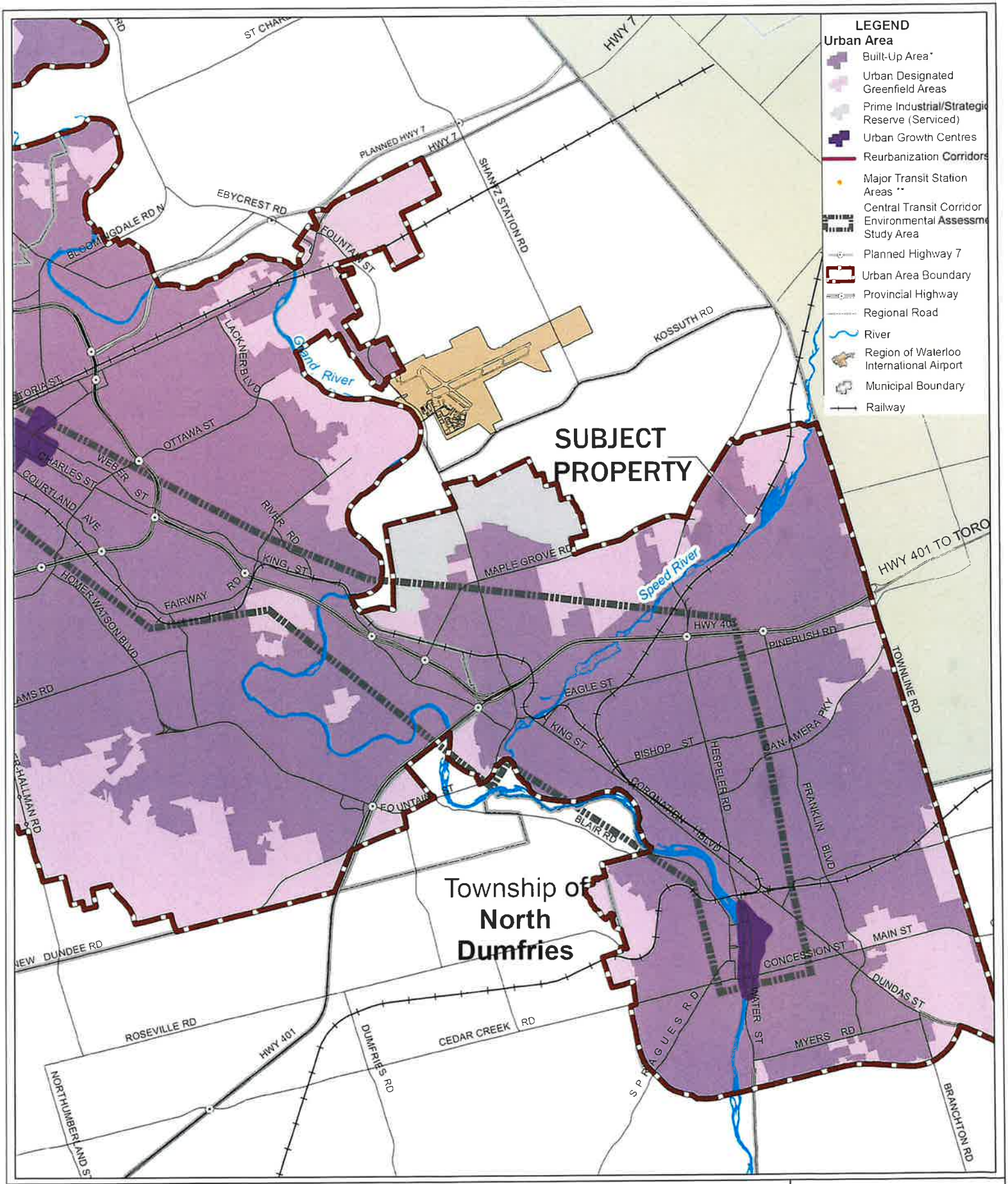
MAP 7:

Cambridge Official Plan, Sourcewater Protection Areas



MAP 8:

Regional Official Plan,
Sourcewater Protection Areas



MAP 9:

Regional Official Plan, Urban Area